

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

Lynchburg Division

In re: KAREN FOSTER, Debtor.	Chapter 11 Case No. 12-60619
JOHN L. WYNNE, Movant, v. KAREN FOSTER, Debtor.	Motion for Relief From Stay

DEBTOR/RESPONDENT'S RESPONSE TO MOTION FOR
PROTECTIVE ORDER

COMES NOW the debtor/respondent, by counsel, who hereby responds to the movant's Motion for a Protective Order.

1. The motion is moot.
2. Depositions were noticed by the debtor for May 4, 2012. No depositions were held because no one appeared to be deposed.
3. The debtor served written discovery requests on the movant, which were returnable on April 30, 2012. The movant did not respond to the written discovery requests.
4. The debtor served subpoenas on various financial institutions. The subpoenas were returnable on April 30, 2012

and the information that was subject to the subpoena has already been provided to debtor's counsel.

5. Therefore, there is no information regarding the movant to protect that has not already been disclosed. In the case of the depositions and written discovery requests, the movant disclosed no information. In the case of the subpoenas, the information has already been disclosed.

Dated: May 9, 2012

Respectfully Submitted,

GARY M. BOWMAN

By: Gary M. Bowman

Gary M. Bowman, Esq.
VSB No. 28866
2728 Colonial Avenue, Ste. 100
Roanoke, Virginia 24015
Tel: (540) 343-1173
Fax: (540) 343-1153

CERTIFICATE OF SERVICE

I, Gary M. Bowman, do hereby certify that a true and correct copy of this Motion was served through the CM/ECF system on May 9, 2012.

GARY M. BOWMAN